The Honorable Jessica G. L. Clarke United States District Court Judge Southern District of New York 500 Pearl Street New York NY, 10007



Re: Letter-Motion for Extension of Time and Leave to File

Your Honor:

I am respectfully writing to request an extension of time of one week for the opposition to both motions to dismiss and my motion for leave to amend with a redlined amended complaint.

I have been working diligently for the past week to produce three memorandum of law and an amended complaint, but despite my best efforts I do not believe this will all be possible for me working alone. I was only able to start on September 9 when I resumed appearing on my own behalf and have been working tirelessly.

I wrote this Monday morning to the counsels opposing me and attempted unsuccessfully to reach them by phone. Considering the 48-hour requirement for extension, and the delay that exists when I file through the Pro Se Office rather than ECF, I file this letter-motion now. If opposing counsel shall agree in the interim I will be happy to sign with them a paper to that effect and have them file it through ECF.

I have not requested any other adjournments or extensions for these submissions.

The current due date is September 19 and I respectfully request a new date of September 26.

Thank you for your consideration of this matter,

Respectfully submitted,

/s/ Gideon Rapaport *pro se*GideonRapaportLaw@outlook.com
(862) 213-0895
#627 1078 Summit Avenue
Jersey City, New Jersey, 07310

Application GRANTED. Plaintiff's motion for leave to amend and opposition to Defendants' motions to dismiss due **September 26, 2024**. Defendants' opposition to Plaintiff's motion for leave to amend and reply in support of Defendants' motions to dismiss due **October 10, 2024**. Plaintiff's reply in support of Plaintiff's motion for leave to amend due **October 17, 2024**.

SO ORDERED.

JESSICA G. L. CLARKE United States District Judge

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Dated: September 19, 2024 New York, New York